

JP:NS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

M 11-604

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(T. 21, U.S.C. § 846)

JOSEPH ROBERT SQUILLANTE,
JOSE RODRIGUEZ-GOMEZ and
FRANKLYN LIZ,

Defendants.

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EASTERN DISTRICT OF NEW YORK, SS:

SHANNON MCFADDEN, being duly sworn, deposes and says that she is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

Upon information and belief, on or about June 12, 2011, within the Eastern District of New York and elsewhere, the defendants JOSEPH ROBERT SQUILLANTE, JOSE RODRIGUEZ-GOMEZ and FRANKLYN LIZ, together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute a substance containing cocaine, a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

(Title 21, United States Code, Section 846).

The source of your deponent's information and the grounds for her belief are as follows:^{1/}

1. On or about June 12, 2011, the defendant JOSEPH ROBERT SQUILLANTE arrived at JFK International Airport ("JFK") in Queens, New York aboard Jet Blue flight No. 832 from Santiago, Dominican Republic. During a Customs examination of the defendant's suitcase, Customs Inspectors discovered that the suitcase had unusually thick walls and was unusually heavy. The walls of the suitcase were probed and revealed a white powdery substance, which field-tested positive for the presence of cocaine. The total approximate gross weight of the cocaine recovered from the defendant JOSEPH ROBERT SQUILLANTE's suitcase was 5605.4 grams.

2. Defendant JOSEPH ROBERT SQUILLANTE was placed under arrest. Subsequent to the reading of his Miranda warnings, the defendant agreed to cooperate with HSI agents. The defendant admitted he knew he was carrying drugs and stated he was to be paid \$5000 to do so. He then stated, in sum and substance, that he had been instructed to meet an individual he knew as "Juano", in the lobby of JFK airport.

3. The defendant JOSEPH ROBERT SQUILLANTE was given a recording transmitter by HSI agents and instructed to deliver the

^{1/} Because the purpose of this affidavit is merely to establish probable cause, I have not set forth all of the facts and circumstances of which I am aware.

suitcase to "Juano," later identified as defendant JOSE RODRIGUEZ-GOMEZ. In the early morning hours of June 13, 2011, the defendant JOSEPH ROBERT SQUILLANTE met the defendant JOSE RODRIGUEZ-GOMEZ in the arrival hall of Terminal 4 at JFK airport. Defendant JOSE RODRIGUEZ-GOMEZ gave defendant JOSEPH ROBERT SQUILLANTE a cellular telephone and asked him to speak to an individual on the phone, later identified as defendant FRANKLYN LIZ. Defendant FRANKLYN LIZ instructed defendant JOSEPH ROBERT SQUILLANTE to meet him in Parking Lot A, where he would be waiting in a white car.

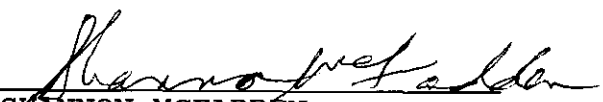
4. Defendant JOSEPH ROBERT SQUILLANTE subsequently met defendant FRANKLYN LIZ in Parking Lot A as instructed and handed him the suitcase. As the defendant FRANKLYN LIZ was loading the suitcase into the white car, ICE agents placed him under arrest.

5. Following his arrest, the defendant FRANKLYN LIZ was given and waived his Miranda warnings. He admitted, in substance and in part, to knowing that there was "something illegal" in defendant JOSEPH ROBERT SQUILLANTE's suitcase and stated that he had been instructed by defendant JOSE RODRIGUEZ-GOMEZ to drive him to JFK airport to pick up defendant JOSEPH ROBERT SQUILLANTE and another individual.

6. HSI agents also placed defendant JOSE RODRIGUEZ-GOMEZ under arrest in the arrival hall of Terminal 4 at JFK airport. The defendant was read his Miranda warnings in Spanish,

which he appeared to understand and waived. Defendant JOSE RODRIGUEZ-GOMEZ admitted he knew there were drugs in defendant JOSEPH ROBERT SQUILLANTE'S suitcase, and stated, in substance and in part, that he was to be paid \$1000 to pick up JOSEPH ROBERT SQUILLANTE and another individual from JFK airport.

7. WHEREFORE, your deponent respectfully requests that the defendants JOSEPH ROBERT SQUILLANTE, JOSE RODRIGUEZ-GOMEZ and FRANKLYN LIZ be dealt with according to law.


SHANNON MCFADDEN
Special Agent
U.S. Department of Homeland Security
Homeland Security Investigations

Sworn to before me _____
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